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March 24, 2003

Ms. Kristy Chew
Siting Project Manager
California Energy Commission
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Sacramento, CA 95814

RE: Data Responses, Informal Set 14B
Cosumnes Power Plant (01-AFC-19)

On behalf of the Sacramento Municipal Utility District, please find attached 12 copies and one original of the Informal Data Responses, Set 14B. This filing contains one additional Air Quality exhibit from the March 13th hearings that was inadvertently omitted from Data Response, Set 14, filed on March 18, 2003.

Please call me if you have any questions.

Sincerely,

CH2M HILL



John L. Carrier, J.D.
Program Manager

c: Colin Taylor/SMUD
Kevin Hudson/SMUD
Steve Cohn/SMUD

COSUMNES POWER PLANT (01-AFC-19)

INFORMAL DATA RESPONSE, SET 14B (HEARING EXHIBITS)

Submitted by
**SACRAMENTO MUNICIPAL
UTILITY DISTRICT (SMUD)**

March 24, 2003



2485 Natomas Park Drive, Suite 600
Sacramento, California 95833-2937

Air Quality Exhibits

**Cosumnes Power Plant
Air Quality Conditions of Certification
Versions Agreed to by CEC Staff and Applicant**

Note: Changes are shown relative to versions contained in the FSA, as amended by the staff in its March 12, 2003 errata. Remaining areas of disagreement are noted.

Conditions AQ-SC1 to AQ-SC2, as presented in the FSA and amended in the Staff Errata, are agreed upon by CEC Staff and Applicant.

AQ-SC3. The on-site AQCOMM shall prepare, and the project owner shall submit to the CPM, in the monthly compliance report, a construction mitigation report that demonstrates compliance with the following mitigation measures:

Subparagraph (a) is still in dispute.

CEC Staff version

- a) All unpaved roads and disturbed areas in the project and linear construction sites shall be watered until sufficiently wet for every four hours of construction activity. The frequency of watering can be reduced or eliminated during periods of precipitation.

Applicant version

- a) All unpaved roads and disturbed areas in the project and linear construction sites shall be watered until sufficiently wet to comply with the dust mitigation objectives of AS-SC4.
- b) No vehicle shall exceed 10 miles per hour within the construction site.
- c) The construction site entrances shall be posted with visible speed limit signs.
- d) All vehicle tires shall be washed or cleaned free of dirt prior to entering paved roadways.
- e) Gravel ramps of at least 20 feet in length must be provided at the tire washing/cleaning station.
- f) All entrances to the construction site or laydown area shall be graveled or treated with water or dust soil stabilization compounds. The location and composition of any dust soil stabilization compounds proposed for use must be approved, in advance, by the CPM.
- g) No construction vehicles can enter the construction site unless through the treated entrance roadways.
- h) Construction areas adjacent to any paved roadway shall be provided with sandbags to prevent run-off to the roadway.
- i) All paved roads within the construction site shall be swept twice daily.
- j) At least the first 500 feet of any public roadway exiting from the construction site shall be swept twice daily.

Deleted: every four hours of construction activity. The frequency of watering can be reduced or eliminated during periods of precipitation

- k) All soil storage piles and disturbed areas that remain inactive for longer than 10 days shall be covered, or be treated with appropriate dust suppressant compounds.
- l) All vehicles that are used to transport solid bulk material and that have potential to cause visible emissions shall be provided with a cover, or the materials shall be sufficiently wetted and loaded onto the trucks in a manner to provide at least one foot of freeboard.
- m) Wind erosion control techniques, such as wind breaks, water/chemical dust suppressants and vegetation, shall be used on all construction areas that may be disturbed. Any windbreaks used to comply with this condition shall remain in place until the soil is stabilized or permanently covered with vegetation.

Subparagraph (n) is still in dispute.

CEC Staff version

- n) Any construction activities that can cause fugitive dust in excess of the visible emission limits specified in Condition **AQ-SC4** shall cease when the wind exceeds 15 miles per hour.

Applicant version

- n) Any construction activities that can cause fugitive dust in excess of the visible emission limits specified in Condition **AQ-SC4** shall cease when the wind exceeds 25 miles per hour.

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- o) All diesel-fueled engines used in the construction of the facility shall be fueled only with ultra-low sulfur diesel, which contains no more than 15 ppm sulfur.

Subparagraphs (o),(p),(q), and (r) are still in dispute.

CEC Staff version

- p) All large construction diesel engines, which have a rating of 100 hp or more, shall meet, at a minimum, the 1996 ARB or EPA certified standards for offroad equipment.
- q) All large construction diesel engines, which have a rating of 100 hp or more, shall be equipped with catalyzed diesel particulate filters (soot filters), unless certified by engine manufacturers or the on-site AQCM that the use of such devices is not practical for specific engine types.
- r) All diesel-fueled engines used in the construction of the facility shall have clearly visible tags issued by the on-site AQCM that shows the engine meets the conditions **AQ-SC3(p)** and **AQ-SC3(q)** above.

Applicant version

- p) All construction diesel engines shall comply with the following mitigation requirements, except as noted below:

Engine Size (BHP)	1996 CARB or EPA Certified Engine	Required Mitigation
< 100	NA	Ultra-low Sulfur Diesel
>= 100	Yes	Ultra-low Sulfur Diesel
>= 100	No	Ultra-low Sulfur Diesel, and Diesel Particulate Filter (DPF) if suitable as

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Deleted: , which have a rating of 100 hp or more, shall meet, at a minimum, the 1996 ARB or EPA certified standards for offroad equipment.¶
q) . All large construction diesel engines, which have a rating of 100 hp or more, shall be equipped with catalyzed diesel particulate filters (soot filters), unless certified by engine manufacturers or the on-site AQCM that the use of such devices is not practical for specific engine types.¶
r) . All diesel-fueled engines used in the construction of the facility shall have clearly visible tags issued by the on-site AQCM that shows the engine meets the conditions **AQ-SC3(p)** and **AQ-SC3(q)** above.

	determined by the CMM
(i)	<u>If the construction equipment is intended to be on-site for ten (10) days or less, then only the use of ultra-low sulfur Diesel fuel shall be required.</u>
(ii)	<u>The CPM may grant relief from the mitigation measures listed in this condition for a specific piece of equipment if the CMM can demonstrate that they have made a good faith effort to comply with the mitigation measures and that compliance is not possible.</u>
(iii)	<u>The use of a DPF may be terminated immediately if one of the following conditions exists, provided that the CPM is informed within ten (10) working days of the termination:</u> <ol style="list-style-type: none"> <u>The use of the DPF is excessively reducing normal availability of the construction equipment due to increased downtime for maintenance, and/or reduced power output due to an excessive increase in back pressure.</u> <u>The DPF is causing or is reasonably expected to cause significant engine damage.</u> <u>The DPF is causing or is reasonably expected to cause a significant risk to workers or the public.</u> <u>Any other seriously detrimental cause which has approval of the CPM prior to the termination being implemented.</u>

Verification: In the monthly compliance report (MCR), the project owner shall provide the CPM a copy of the construction mitigation report and any diesel fuel purchased records, which clearly demonstrates compliance with condition AQ-SC3.

The following change to Condition AQ-SC4 has been agreed to by CEC Staff and Applicant.

AQ-SC4. No construction activities are allowed to cause visible dust emissions at or beyond the project site fenced property boundary. No construction activities are allowed to cause visible dust plumes that exceed 20 percent opacity at any location on the construction site. No construction activities are allowed to cause any visible dust plume in excess of 200 feet beyond the centerline of the construction of linear facilities.

Verification: The on-site AQCM shall conduct a visible emission evaluation at the construction site fence line, or 200 feet from the center of construction activities at the linear facilities, each time he/she sees excessive fugitive dust from the construction or linear facility site. The records of the visible emission evaluations shall be maintained at the construction site and shall be provided to the CPM in the monthly compliance reports.

Condition AQ-SC5 (additional PM mitigation) has been deleted by agreement between CEC Staff and Applicant.

Condition AQ-6, as presented in the FSA and amended in the Staff Errata, is agreed upon by CEC Staff and Applicant.

Conditions AQ-SC7 (ammonia slip) and AQ-SC8 (additional reporting requirements), are in dispute. CEC Staff version is as presented in the Staff Errata. Applicant proposes deletion of these conditions in their entirety.

Conditions AQ-1 to AQ-31, as presented in the FSA and amended in the Staff Errata, are agreed upon by CEC Staff and Applicant.

Condition AQ-32 is in dispute

CEC Staff version

AQ-32. The CPP shall operate a continuous monitoring system that has been approved by the Air Pollution Control Officer that either measures or calculates and records the following.

{No change proposed to table}

Verification: At least sixty (60) days prior to purchase of the continuous monitoring system, the project owner shall submit to the District and the CPM, for approval, a copy of the manufacturer specifications for the continuous monitoring system, which demonstrates compliance with the District's monitoring requirements.

Applicant version

AQ-32. The CPP shall operate a continuous monitoring system that has been approved by the Air Pollution Control Officer that either measures or calculates and records the following.

{No change proposed to table}

Verification: At least sixty (60) days prior to purchase of the continuous monitoring system, the project owner shall submit to the District for approval, and to the CPM, for review, a copy of the manufacturer specifications for the continuous monitoring system, which demonstrates compliance with the District's monitoring requirements.

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Conditions AQ-33 to AQ-41, as presented in the FSA and amended in the Staff Errata, are agreed upon by CEC Staff and Applicant. The changes below to AQ-42 and AQ-43 have been agreed to by CEC Staff and Applicant, but were inadvertently omitted from the Staff Errata.

AQ-42. SMUD shall pave the roadways described in SMAQMD ERC applications 00768, 00769, 00772-00776.

Verification: Prior to issuance of the District emission reduction credit certificates, the project owner shall provide the District and the CPM the work order completion and pictures of the roadways before and after paving is performed.

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AQ-43. SMUD shall ensure that the paved roads described in SMAQMD ERC applications 00768, 00769, 00772-00776 are properly maintained and repaired for the life of the Cosumnes Power Plant.

Verification: The project owner shall include pictures of the roadways after being paved for credits in the annual compliance report required in the verification requirement for condition AQ-34.

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